

Conflict of Interest Policy

Statement of Purpose

The purpose of this policy and procedure is to set forth the necessary guidelines and implementation steps for the avoidance of a conflict of interest or the appearance of a conflict of interest by the Land Of Lincoln Workforce Alliance staff in their official dealings with immediate family, close family members, agency employees' family, elected officials, WIB members and WIOA stakeholders.

This will ensure all individuals enrolled in the WIOA program have been determined eligible, assessed and served in an ethical manner that is free from any real or perceived conflict of interest.

Although WIOA is not an entitlement program, access to needed services by eligible and suitable individuals is essential in order to fulfill the goals and objectives of the legislation. Local elected officials, workforce boards, designated fiscal agents, and administrative entities meet objectives through effective policies, procedures and safeguards that ensure the integrity of these public funds.

LLWA personnel will avoid a conflict of interest or the appearance of a conflict of interest in conducting their official duties. In no instance shall any person determine eligibility, assess or directly serve a member of his or her immediate family or an individual with whom a close personal relationship exists. Likewise, stakeholders identified in this assurance shall not use his or her position to influence on a decision to enroll an individual in the WIOA program.

Procedures

- A. Prior to enrollment in WIOA, Career Planners will ask all potential WIOA enrollees by questionnaire, whether they have a close relationship with LLWA staff or management, agency employees or other stakeholders (including WIB members, youth council committee members or local elected officials).
- B. Should a potential enrollee disclose a close personal relationship with any of these, this fact will be brought to the attention of the LLWA Executive Director by the WIOA Career Planner.
- C. All LLWA staff, management and stakeholders have a duty to inform the LLWA Executive Director when a person with whom they have a close personal relationship is applying for services. The staff member or stakeholder will remove themselves from any involvement in the case and the Executive Director will ensure that the case will be reassigned to another WIOA Career Planner.
- D. The Executive Director will remove the staff member from any assignment involving the customer and will ensure that the customer is assigned to a staff member having no potential conflict of interest. Decisions related to approval of training, supportive services or other service needs must be made by staff having no potential conflict of interest.

- E. If the LLWA Executive Director is absent or is the subject of the potential conflict of interest, then this responsibility will lie with remaining LLWA Supervisors.
- F. This policy will be distributed to all LLWA staff members, elected officials, WIB and Youth Council Committee members.

Definitions

- Close Family Member:** Include parents, children, siblings, spouses and domestic partners, Civil Union partnerships.

- Immediate Family:** Consists of the individual's parents (including step-parents), spouse, domestic or civil union partner, children (including step-children), foster children, siblings, grandchildren, grandparents, and any relatives by marriage (and in-law).

- Stakeholders:** Individuals not related to WIOA agency staff or Management, that direct or indirect management or responsibility for managing the WIOA workforce system, including managers, supervisors, local, elected officials, contractors, WIOA and Youth Council Committee members, LLWA employees.